

EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:

-----X
OMAR SALEM,

Plaintiff,

-against-

J.B. HUNT TRANSPORT, INC and JEFFREY ROGERS,

Defendants.
-----X

SUMMONS

Plaintiff designates Kings County
as the place of trial.

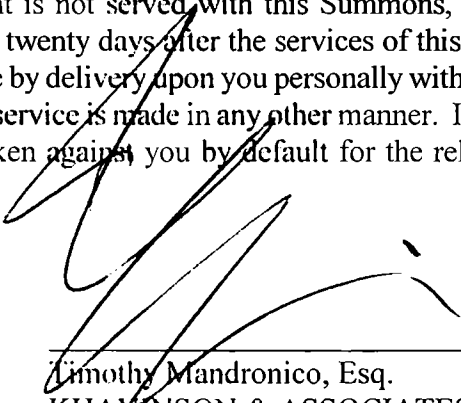
The basis of venue is:
Plaintiff's Residence

Plaintiff's Residence:
7217 3rd Avenue Apt 3L
Brooklyn, New York 11209

To the above named Defendants

YOU ARE HEREBY SUMMONED to answer the Complaint in this action, and to serve a copy of your Answer, or if the Complaint is not served with this Summons, to serve a Notice of Appearance on Plaintiff's attorneys within twenty days after the services of this Summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

DATED: New York, New York
January 17, 2022



Timothy Mandronico, Esq.
KHAVINSON & ASSOCIATES, P.C.
Attorneys for the Plaintiff
45 Broadway, Suite 720
New York, New York 10006
T: (212) 785-5000
F: (347) 983-6992
File No.: E-07085

To: J. B. HUNT TRANSPORT, INC.
P.O. BOX 130, 615
J.B. HUNT CORPORATE DR
LOWELL, ARIZONA 72745

JEFFREY ROGERS
1235 RUSSELL AVENUE
FOUNTAIN HILL, PA 18015

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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OMAR SALEM,

Plaintiff,

VERIFIED COMPLAINT

-against-

Index No.:

J.B. HUNT TRANSPORT, INC and JEFFREY ROGERS,

Defendants.

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Plaintiff, OMAR SALEM, by his attorneys, KHAVINSON & ASSOCIATES, P.C., as and
for a cause of action alleges upon information and belief as follows:

1. At all times mentioned herein, Plaintiff, OMAR SALEM, was and is still a resident of the State of New York, Kings County.
2. At all times mentioned herein, Plaintiff, OMAR SALEM, was and is over the age of 18 years old.
3. That on July 22, 2021 at or about 6:34 PM, Plaintiff, OMAR SALEM, was the registered owner of a 2022 KIA motor vehicle bearing Washington State license plate number ELT8290.
4. That on July 22, 2021 at or about 6:34 PM, Plaintiff, OMAR SALEM, was operating 2022 KIA motor vehicle bearing Washington State license plate number ELT8290.
5. That on July 22, 2021 at or about 6:34 PM, Plaintiff, OMAR SALEM, was the operator of a 2022 KIA motor vehicle bearing Washington State license plate number ELT8290, while traveling on or about the Hamilton Avenue intersecting 3rd Avenue, County of Brooklyn, City and State of New York.
6. That on July 22, 2021 at or about 6:34 PM, Defendant, J.B. HUNT TRANSPORT, INC, was and is a foreign business corporation registered with the State of New Georgia.
7. That on July 22, 2021 at or about 6:34 PM, Defendant, J.B. HUNT TRANSPORT. INC,

was and still is a foreign Business Corporation licensed to do business the State of New York, with its Principal Place of Business located at 138 Ridgewood Avenue Newark, New York 07108.

8. That on July 22, 2021 at or about 6:34 PM, Defendant, J.B. HUNT TRANSPORT, INC was the registered owner of a 2021 INTERNATIONAL truck.
9. That on July 22, 2021 at or about 6:34 PM, Defendant, J.B. HUNT TRANSPORT, INC, was the registered owner of a 2021 INTERNATIONAL truck, bearing Oklahoma State license plate number 3ES994.
10. That on July 22, 2021 at or about 6:34 PM, Defendant, JEFFREY ROGERS, was the operator of a 2021 INTERNATIONAL truck.
11. That on July 22, 2021 at or about 6:34 PM, Defendant, JEFFREY ROGERS, was the operator of a 2021 INTERNATIONAL truck, bearing Oklahoma State license plate number 3ES994.
12. That on July 22, 2021 at or about 6:34 PM, Defendant, JEFFREY ROGERS, was the operator of a 2021 INTERNATIONAL truck bearing Oklahoma State license plate number 3ES994, with the permission and consent of its owner, Defendant, J.B. HUNT TRANSPORT, INC.
13. That on July 22, 2021 at or about 6:34 PM, Defendant, JEFFREY ROGERS, was an employee of Defendant, J.B. HUNT TRANSPORT, INC.
14. That on July 22, 2021 at or about 6:34 PM, Defendant, JEFFREY ROGERS, was operating a 2021 INTERNATIONAL truck while in the scope of his employment with Defendant, J.B. HUNT TRANSPORT, INC.
15. That on July 22, 2021 at or about 6:34 PM, there was a two-vehicle collision involving the

vehicle operated by Defendant, JEFFREY ROGERS, and the vehicle operated by Plaintiff, OMAR SALEM, while traveling on or about Hamilton Avenue and 3rd avenue, County of Kings, City and State of New York.

16. That said collision occurred when the vehicle operated by Defendant, JEFFREY ROGERS negligently and without signal or warning came into contact with the motor vehicle operated by Plaintiff, OMAR SALEM.
17. That Defendants violated the New York Vehicle and Traffic Laws as well as the Rules of the City of New York.
18. That Defendant, JEFFREY ROGERS, failed to use reasonable care under the circumstances in order to avoid the subject collision, thereby solely causing the collision.
19. That as a result of the said collision, all of the involved motor vehicles sustained vehicular damage.

AS AND FOR A FIRST CAUSE OF ACTION FOR PLAINTIFF
OMAR SALEM

20. Plaintiff, OMAR SALEM, repeats and re-alleges all the allegations contained in paragraphs "1 through 19" above as if set forth fully.
21. That the aforesaid collision described in paragraphs "14 through 19" above was solely caused by Defendants' negligence.
22. That the aforesaid collision described in paragraphs "14 through 19" above was solely caused by Defendants' recklessness.
23. That Plaintiff, OMAR SALEM, shares no comparative fault and displayed no want of care for the subject collision.
24. That as a direct result of Defendants' negligence and/or recklessness, Plaintiff, OMAR SALEM, was rendered sick, lame, unable to work, suffered mental anguish, emotional

distress, pain and suffering, and loss of enjoyment in his life.

25. That Plaintiff, OMAR SALEM, was seriously and permanently injured under New York Insurance Law § 5102(d) solely as a result of Defendant's negligence and/or recklessness.
26. That Plaintiff, OMAR SALEM, will require medical attention for the rest of his life as a result of his aforesaid serious and permanent injuries.
27. That as a direct result of Defendants' negligence and/or recklessness, Plaintiff, OMAR SALEM, sustained economic damages in excess of basic economic loss under New York Insurance Law § 5104.
28. That by reason of the foregoing, Plaintiff, OMAR SALEM, has been damaged in an amount, which exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.
29. That this action falls under one or more of the exceptions of Article 1602 of New York's CPLR.

WHEREFORE, Plaintiff, OMAR SALEM, demands judgment against the above-named Defendants collectively and individually in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction, together with costs and disbursements of this action, and such other and further relief that this Court deems just and proper.

Dated: New York, New York
January 17, 2022


Yours, etc.

Timothy Mandronico, Esq.
KHAVINSON & ASSOCIATES, P.C.
Attorneys for Plaintiff
OMAR SALEM
45 Broadway, Suite 720
New York, New York 10006
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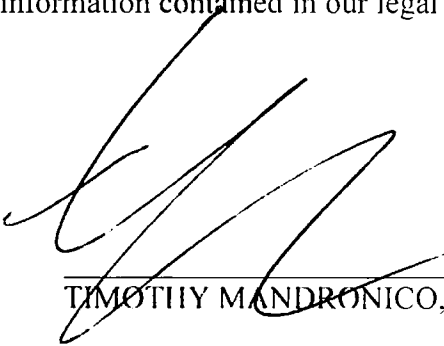
ATTORNEY VERIFICATION

State of New York }
 } SS:
County of New York }

I, Timothy Mandronico, Esq., the undersigned, an attorney admitted to practice in the courts of the State of New York, and associated with the law firm of **KHAVINSON & ASSOCIATES, P.C.**, state that **KHAVINSON & ASSOCIATES, P.C.** are the attorneys of record for Plaintiff **OMAR SALEM** in the within action. I have read the foregoing **SUMMONS AND VERIFIED COMPLAINT** in the within action and know the contents thereof, the same are true to my knowledge except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. The reason this verification is made by the undersigned attorney and not by the Plaintiff is that Plaintiff reside(s) in a county other than which this law office maintains its offices.

The grounds of my belief as to those matters therein not stated upon knowledge is based upon facts, records, and other pertinent information contained in our legal files maintained in the ordinary course of business.

DATED: New York, New York
 January 17, 2022



TIMOTHY MANDRONICO, ESQ.

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SUMMONS AND VERIFIED COMPLAINT

KHAVINSON & ASSOCIATES, P.C.

Attorneys for Plaintiff

45 Broadway, Suite 720

New York, New York 10006

T: (212) 785-5000

F: (347) 983-6992

<http://khavinsonlawfirm.com/>
